

## COMPLAINT TO FORECLOSE THE EQUITY OF REDEMPTION

John J. Hayes, Jr., Plaintiff, by Robert J. Kresslein and STERN & KRESSLEIN, P.A., his attorneys, sues Herman Fischer, Maryland National Bank, successor to Western Maryland Trust Company, Farmers & Mechanics National Bank of Frederick, Martha Ann Brittain, Frederick County Treasurer, and any all persons having or claiming to have an interest in the real estate which is the subject of this complaint and states as follows:

1. That on or about November 12, 1985, Martha Ann Brittain, the County Treasurer and Collector of taxes for Frederick County, Maryland sold unto John J. Hayes Jr., Plaintiff, at public auction for the sum of Two Thousand Dollars (\$2,000.00) a parcel of real estate without improvements which is more particularly described as follows:

All that piece or part of a parcel of land situate, lying and being along the northern side of the State Road now known as U.S. Route 40 (now U.S. 40 Alternate), in Braddock Election District, Frederick County, State of Maryland and being part of the same land referred to and described in a deed from Daisey M. Coblentz, Widow, to the said Tempa F. Collins, dated November 16, 1945, and duly recorded in liber 452, folio 299 et. seq., one of the land records of Frederick County, aforesaid and more particularly described as follows:

Beginning at a point in the aforesaid public highway, beginning also at the end of a second line in the deed from Coblentz to Collins, aforesaid, and running thence by and with the third line in said deed, north 46 3/4 degrees west, 126 feet to a point; thence in a straight line in a northeasterly direction 296 feet, more or less, to intersect with the first line in the aforesaid deed at a point 100 feet from the end thereof; thence south 28 degrees east 100 feet to the end of said first line, thence south 45 degrees west 15.6 perches to the place of beginning containing .74 acres of land more or less.

Together with all and every other rights, way, privileges, appurtenances and advantages to the same belong in any wise appertaining.

2. That on November 12, 1985, the Plaintiff paid unto Martha Ann Brittain, County Treasurer and Collector of Taxes as aforesaid, the sum of Two Hundred Eighteen and 83/100 (\$218.83) as will appear by referenced certificate of sale number 0565,